

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of Section 63.71 Application of

Affiniti, LLC and Affiniti PA, LLC for
Authority Pursuant to Section 214 of the
Communications Act to Discontinue its
Wireline Telecommunications Services

WC Docket No. 19-151
Comp. Pol. File No. 1538

REPLY COMMENTS OF AFFINITI

Affiniti LLC and Affiniti PA, LLC (“Affiniti”) hereby respond to the comments filed in the above-captioned docket and file number by ARIN Intermediate United 28 (“ARIN IU 28”).¹ ARIN IU 28 has a contract with Affiniti PA, LLC for the provision of broadband Internet access services.² As ARIN IU 28 notes, that contract will expire on June 30, 2019 and in February 2019, ARIN IU 28 secured a service contract from another provider after a competitive bidding process.³ The fact that delivery of those services by a third party may be delayed is not Affiniti’s responsibility, particularly when ARIN IU 28 and its vendor had months to prepare for the change in providers. Nevertheless, Affiniti has been diligently working with ARIN IU 28 to assist it in obtaining alternative services for any gap period before ARIN IU 28’s new permanent vendor has all the necessary circuits ready.

¹ Comments of ARIN Intermediate United 28 Opposing Application for Discontinuance of Service, WC Docket No. 19-151, Comp. Pol. File No. 1538 (filed June 14, 2019) (“ARIN IU 28 Comments”). ARIN IU 28 is the only party to have filed comments on Affiniti’s discontinuance application. *In Re Section 63.71 Application of Affinit, LLC and Affiniti PA, LLC for Authority Pursuant to Section 214 of the Communications Act to discontinue its Wireline Telecommunications Services*, Section 63.71, WC Docket No. 19-151, Comp. Pol. File No. 1538 (filed May 22, 2019) (“Affiniti Application”).

² Internet access services are classified as unregulated information services under the Communications Act, as amended. These services, therefore, are outside the scope of the present proceeding because the requirement to seek Commission approval under 47 U.S.C. § 214(a) and 47 C.F.R. § 63.71, do not apply to information services. Nevertheless, Affiniti is responding to ARIN IU 28’s comments in the spirit of acting as a good corporate citizen.

³ ARIN IU 28 p. 2-3.

Those efforts appear to be bearing fruit. The new service provider seems to have made arrangements for a temporary solution to ensure continuity of service on July 1 and in the event that those arrangements fail, Affiniti has helped to facilitate discussions with a wireless Internet service provider in the area that can provide service on a temporary basis until the new vendor's fiber facilities are ready.

In short, it appears that there are multiple solutions at the ready to ensure continuity of service to ARIN IU 28 as of July 1 from multiple vendors, including the entity with which ARIN IU 28 entered into a contract for service months ago.

WHEREFORE, Affiniti, LLC and Affiniti PA, LLC respectfully request that the Commission continue to process Affiniti's Application pursuant to its streamlined procedures, and that it permit Affiniti to discontinue the Discontinued Wireline Services on June 30, 2019.

Respectfully submitted:



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